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NAS BRUNSWICK  
5090.3a**Brunswick Area Citizens for a Safe Environment**

P.O. Box 245 Brunswick, Maine 04011 (207)725-1330

August 1, 1996

To: Fred Evans  
U.S. Navy Northern Division  
Box 610-595-0555

Dear Mr. Evans,

Please find enclosed Review of Draft  
Work Plan, Site 9, prepared by our Con-  
sultant Firm Robert G. Gerber, Inc.

Should you have questions regarding  
this material please contact Carolyn  
Le Page at 207-865-6138.

Sincerely,  
Ponkie Hoflich  
Secretary

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Our comments on the draft *Work Plan* are as follows:

1. Page 1-4. It is not clear how the activities described in the subject document relate to the interim remedial action for groundwater at Site 9 or the investigations at the Naval Exchange (NEX) gasoline station. The Introduction (or other appropriate section) should provide an explanation of the various environmental investigations being conducted at Site 9 and the NEX, and how the data generated will be used to develop a final Record of Decision (ROD). We also recall that roadwork would be conducted along Neptune Drive this summer. At one of the TRC meetings we attended, it was suggested that the Navy take advantage of the opportunity to observe subsurface conditions in the middle of Site 9, but there is no mention of the Neptune Drive construction activities in the *Work Plan*.
2. Page 1-3. Why is ABB-ES' corporate *Health and Safety Plan (HASP)* incorporated by reference. The site-specific HASP should be a stand-alone document as any personnel, including non-ABB-ES people, intending to enter the exclusion zone during site investigations must sign off on the site-specific HASP, not the corporate HASP. As we do not have copies of either the ABB-ES corporate HASP or the 1988 *Quality Assurance Program Plan (QAPP)*, we are not able to provide any comments relating to those two documents. Also, given the date of the QAPP, is it time to review and possibly revise the document.
3. Page 1-5. The sentence at the top of the page appears to be incomplete.
4. Page 2-1. The second *Work Plan* objective listed in Section 2.1 is to "summarize procedures for conducting field activities." Where will the details of the procedures be described.
5. Page 2-1. The date of the corporate HASP is given as 1990 on page 1-3 and 1985 on page 2-1. Which date is correct. Comment 2 also applies to Section 2.2 regarding referring to more than the site-specific HASP.
6. Page 2-3. Who will be responsible for approving the field exploration locations. Who will be responsible for notifying DigSafe.
7. Page 2-5. Where will the wastes placed in the on-site dumpsters be disposed. How will drill cuttings be handled.
8. Page 3-3. Who will be responsible for notifying DigSafe.
9. Page 3-5. The reference containing the documentation regarding the fuel odor at T-23 should be cited. Given the concerns with the fuel odors, split spoon sampling should be continuous at the soil boring proposed for this location. Soil samples should be field-screened for volatile organic compounds with the photoionization (PI) meter, and the sample with the highest reading

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and/or the most visible signs of contamination should be sent to the laboratory for analysis. If there is no response with the PI meter and no visual evidence of contamination, the sample from 8 to 10 feet bgs (below ground surface) should be analyzed. Additional information concerning the PI meter field screening method should be provided. Are there any plans to install a monitoring well at the soil boring location described in Section 3.2.1. If not, why not.

10. Page 3-6. It is not clear how the three proposed wells will "complement" the Naval Exchange (NEX) wells. A map showing the locations of the monitoring wells installed as part of the NEX gasoline station investigation, along with the existing and proposed Site 9 monitoring wells would be very helpful. It is also not clear why the three new monitoring wells are in the locations proposed. What are the three wells intended to monitor. Additional information concerning the drilling method and soil sampling procedure is needed. While the final placement of the well screen will be decided in the field, are the proposed wells intended to monitor the phreatic surface.

11. Page 3-7. Additional information concerning the field screening with the PI meter that will be used to determine the placement of the well screen. The second paragraph should include information to clarify what material will be placed above the seal located above the sandpack. How will the well riser and protective casing be vented.

12. Page 3-9. As with comment 10 above, the rationale for excavating test pits at the four proposed locations is not clear. What is the goal of the test pitting. Additional information concerning the PI meter headspace screening method should also be presented.

13. Page 3-10. What happens to the drums of cleaning fluids with PI readings in excess of 5 ppm (parts per million) above background after they've been transported to the NAS Brunswick Defense Reutilization and Marketing Office.

14. Page 3-12. In order to minimize the loss of volatile organic compounds (VOCs) during the sampling process, the portion of the soil sample used for the PI meter headspace screening should have minimal exposure to the air. It appears that the process of "homogenizing" the soil sample will enhance the loss of VOCs. What are the criteria for selecting one soil sample per test pit for laboratory analysis.

15. Page 3-12. A map showing the Site 9 monitoring wells and the NEX gasoline station monitoring wells is needed. Will the point-source bailers also be used to purge the wells. What are the criteria for determining when in situ parameters monitored during purging are considered "stabilized".

16. Page 3-13. The well depth and condition should also be checked and recorded during the sampling event.

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17. Page A.1-3. Who are the Health and Safety Manager and the Health and Safety Supervisor.
18. Page A.1-4. The meaning of the first part of the first sentence in Section A.1.2.6 is not clear.
19. Page A.1-5. The medical surveillance requirements should be described in detail, rather than by reference, so that personnel reviewing the HASP prior to entering the site will know if they are medically qualified.
20. Page A.2-1 - A.2-4. Section A.2, entitled "Site Characterization and Analysis" covers the site location and history, but not the results of earlier environmental investigations and analytical results. This data should be summarized to provide the necessary background concerning potential risks at Site 9.
21. Page A.2-5. The description of how health safety hazards might be encountered should include the hazards associated with soil boring, well installation, and test pit activities.
22. Page A.3-3. How much will PI meter readings have to exceed background readings before personnel upgrade to Level C. The Action Levels should be clearly described.
23. Page A.4-3. There appears to be a typo on the last sentence of the first paragraph. The second sentence of the second paragraph should be deleted.
24. Page A.6-2. Which UV source will be used with the HNU. How will background levels be determined.
25. Page A.6-3. How is the Radiation Monitor 4 meter calibrated. The results of the radiation monitoring should be included in the data report.
26. Page A.7-5. The disposal of decontamination fluids described in Section A.7.3 is not the same as the procedures outlined on page 3-10.
27. Page A.10-4. There is no Appendix F in our copy of the HASP.
28. General Comment. A number of issues should be included or expanded upon in order to consider the subject document complete. Several of these issues have been discussed at TRC and technical meetings or have been addressed in earlier correspondence between the Navy and other parties. The topics that should be addressed in the *Work Plan* include: the rationale for the number and placement of test pits, the boring, and the wells; the additional tasks, such as review of historical air photos and evaluation of nearby building uses, to identify potential upgradient sources; and, the relationship of this work plan to the interim ROD and the NEX gas station investigation. In addition, the *Work Plan* should also provide more information concerning the

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specific field methods to be employed, what will be included in the data presentation and interpretation report, and when the report will be available. An additional community concern is that contaminants detected in the stream sediments at Site 9 be addressed in a timely and appropriate fashion.

Please do not hesitate to give us a call if you have any questions on the comments above.

Sincerely,  
Robert G. Gerber, Inc.

*Carolyn A. Lepage*  
Carolyn A. Lepage, C.G.  
Director of Operations.

